

Exhibit 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Stanley Zhong, Nan Zhong, and
SWORD (Students Who Oppose Racial
Discrimination),

Plaintiffs,

v.

Case No. 2:25-cv-10579
Hon. Gershwin A. Drain
Mag. Judge David R. Grand

The Regents of the University of Michigan,

Defendant.

Stanley Zhong
211 Hope St, #390755
Mountain View, CA 94039

Nan Zhong
211 Hope St #390755
Mountain View, CA 94039
425-698-9139
nanzhong1@gmail.com

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Sydney G. Rohlicek (P85655)
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**[PROPOSED] STIPULATED ORDER PERMITTING PLAINTIFFS
TO FILE A FIRST AMENDED COMPLAINT AND EXTENDING
DEFENDANT’S TIME TO RESPOND**

Plaintiffs, Stanley and Nan Zhong, along with Defendant, the Regents of the University of Michigan, hereby submit this joint stipulated request and Order allowing Plaintiffs to file a First Amended Complaint and resetting Defendant’s deadline by which to file an answer or other responsive pleading:

1. On February 27, 2025, Plaintiffs filed their Complaint. (ECF No. 1).
2. On April 8, 2025, the University of Michigan executed a waiver of service, making its responsive pleading due on June 9, 2025. (ECF No. 8).
3. On May 16, 2025, Plaintiff Students Who Oppose Racial Discrimination (“SWORD”) filed a “Motion to Drop” the entity as a Plaintiff. (ECF No. 16). Defendant has no objection to the relief requested therein.
4. On May 21, 2025, pursuant to Local Civil Rule 7.1, Defendant sought Plaintiffs’ concurrence to its forthcoming Motion to Dismiss all of Plaintiffs’ claims.
5. On May 23, 2025, Plaintiff Nan Zhong denied concurrence and indicated Plaintiffs’ intent to file a First Amended Complaint.
6. Given Plaintiffs’ stated intent, the parties accordingly agree that Defendant need not file an answer or otherwise respond to Plaintiffs’ Complaint.

NOW THEREFORE, IT IS HEREBY ORDERED that Plaintiff shall file a First Amended Complaint within fourteen (14) days of entry of this Order.

IT IS FURTHER ORDERED that Defendant shall file its responsive pleading to Plaintiffs’ First Amended Complaint within twenty-one (21) days after it is filed with the Court.

Dated: _____

United States District Court Judge

STIPULATION

The parties stipulate and agree to the entry of this Order.

/s/ Stanley Zhong (w/ consent)

Stanley Zhong
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/s/ Nan Zhong (w/ consent)

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/s/Brian M. Schwartz

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